

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SANDERS COLLECTION INC.,

Plaintiff,

v.

DBEST PRODUCTS, INC.,

Defendant.

CIVIL ACTION NO. 24-cv-10045 (AS)

**NOTICE OF MOTION TO DISMISS  
STATE LAW TORT CLAIMS**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, Defendant dbest products, Inc. (“dbest”), by and through its undersigned counsel, hereby moves the Court to dismiss Plaintiff Sanders Collection Inc.’s (“Sanders”) state law tort claims pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

Dated: April 4, 2025

Respectfully submitted,

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